

AUSA Branka Cimesa (312) 353-6630

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

Jalen Jace Cancel


Case No.: 1:24-CR-00542

Beth W. Jantz  
Magistrate Judge

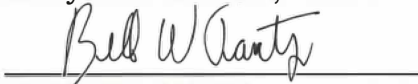
**AFFIDAVIT IN REMOVAL PROCEEDING**

I, CHARLES STANLEY, appearing before United States Magistrate Judge BETH W. JANTZ by telephone and being duly sworn under oath, state that as a federal law enforcement officer I have been informed that JAYLEN JACE CANCEL has been charged by criminal complaint in the Eastern District of Oklahoma with the following criminal offenses: wire fraud, conspiracy to commit wire fraud, money laundering conspiracy, money laundering, and unlawful monetary transactions in violation of Title 18, United States Code, Sections 1343, 1349, 1956(h), 1956(a)(1)(B)(i), and 1957.

A copy of the criminal complaint and arrest warrant are attached.

  
CHARLES STANLEY  
Special Agent  
Federal Bureau of Investigation

SWORN TO AND AFFIRMED by telephone this 21st day of November, 2024.

  
BETH W. JANTZ  
United States Magistrate Judge

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JALEN JACE CANCEL,

*Defendant.*

### WARRANT OF ARREST

**SEALED**

Case No. 24-MJ-386-DES

To: The United States Marshal and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest: **JALEN JACE CANCEL**

and bring him forthwith to the nearest magistrate judge to answer a:

☐ Indictment ☐ Information ☒ Complaint ☐ Order of Court ☐ Violation Notice ☐ Probation Violation Petition

charging him with: Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349 and 1343, Wire Fraud, in violation of Title 18, United States Code, Section 1343, Money Laundering Conspiracy, in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i); Money Laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and Unlawful Monetary Transactions, in violation of Title 18, United States Code, Section 1957.

D. EDWARD SNOW

Name of Issuing Judicial Officer



Signature of Issuing Judicial Officer



**UNITED STATES MAGISTRATE JUDGE**

Title of Issuing Judicial Officer

**November 18, 2024, Muskogee, Oklahoma**

Date and Location

Bail fixed at \$ \_\_\_\_\_

by: \_\_\_\_\_  
Name of Judicial Officer

### RETURN

This warrant was received and executed with the arrest of the above-named defendant at:

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

EDOK Criminal Complaint (Revised 6/13)

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JAYLEN JACE CANCEL,

*Defendant.*

**CRIMINAL COMPLAINT**

**Case No. 24-MJ-386-DES**

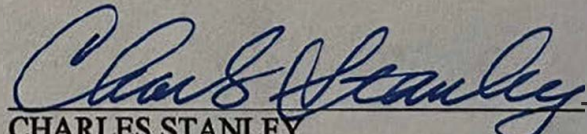
I, Charles Stanley, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

Between June 2023 and October 2023, in the Eastern District of Oklahoma, **JALEN JACE CANCEL**, committed the crimes of Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349 and 1343, Wire Fraud, in violation of Title 18, United States Code, Section 1343, Money Laundering Conspiracy, in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i); Money Laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and Unlawful Monetary Transactions, in violation of Title 18, United States Code, Section 1957.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

(See attached Affidavit of Charles Stanley, which is attached hereto and made a part hereof by reference.)

☒ Continued on the attached sheet.



CHARLES STANLEY

Special Agent

Federal Bureau of Investigation

Sworn to on November 18, 2024

D. EDWARD SNOW  
UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer



Signature of Judicial Officer

**AFFIDAVIT**

I, Charles Stanley, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since May of 2016.

2. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to computer intrusions and fraud resulting from computer intrusions. I have received training in cyber security from the SANS Institute and have obtained Global Information Assurance (GIAC) certifications for Security Essentials (GSEC), Incident Handling (GCIH), Penetration Testing (GPEN) and Python coding (GPYC). I have participated in the execution of multiple federal search warrants.

3. This affidavit is made in support of an application for warrants to arrest Jalen Jace Cancel and Omobolonle (a.k.a. "Bola," "Bola Flexx") Bombata concerning conspiracy to commit wire fraud, wire fraud, conspiracy to commit money laundering, money laundering, and unlawful monetary transactions, in violation of Title 18, United States Code, Sections, 1343, 1349, 1956 and 1957 ("**Subject Offenses**").

4. Since this affidavit is being submitted for the limited purpose of enabling a judicial determination of whether probable cause exists to justify the issuance of a criminal complaint, Affiant has not included each and every fact known to me and others concerning this investigation. Affiant has set forth only the facts that Affiant believes are essential to establish the necessary foundation for a criminal complaint.

5. Affiant submits that there is probable cause to believe that, from in and around June 2023, and continuing through in and around November 2023, in the Eastern District of Oklahoma and elsewhere, **JALEN JACE CANCEL**, hereafter referred to as "Cancel," and

**OMOBOLANLE (a.k.a. “BOLA,” “BOLA FLEXX”) BOMBATA**, hereafter referred to as “Bombata,” did knowingly and intentionally conspire and agree together with other persons known and unknown to the United States, to devise a scheme and artifice to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343 and 1349.

6. Affiant submits that there is probable cause to believe that, from in and around June 2023, and continuing through in and around November 2023, in the Eastern District of Oklahoma and elsewhere, Cancel and Bombata did knowingly and intentionally conspire and agree together with other persons known and unknown to the United States, to attempt to conduct financial transactions which involved the proceeds of wire fraud knowing that the transaction was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of wire fraud, contrary to Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(h).

7. Affiant submits that there is probable cause to believe that, from in and around June 2023, and continuing through in and around November 2023, in the Eastern District of Oklahoma and elsewhere, Cancel and Bombata did knowingly and intentionally conspire and agree together with other persons known and unknown to the United States, to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from wire fraud, contrary to Title 18, United States Code, Sections 1957(a) and 1956(h).



## I. FACTS SUPPORTING PROBABLE CAUSE

### A. Corporation Email Compromise

8. Corporation, hereafter referred to as is a business located at in Ardmore, Oklahoma. also operates under the business name Materials & Manufacturing, Incorporated at the same address. Both Corporation and Materials & Manufacturing, Incorporated are located within the Eastern District of Oklahoma.

9. The website for states its core business is “construction/rehabilitation of public and private heavy civil infrastructure.”

10. According to law enforcement’s interview of an executive in or around November 2023, Brothers Corporation, hereafter referred to as “ was largest aggregates<sup>1</sup> provider. had conducted business with for approximately thirty years. used the domain name “ com”.

11. On or around November 2023, law enforcement interviewed who was a staff accountant and worked in accounts payable at the headquarters facility, located at in Ardmore, Oklahoma, 73401, which is located in the Eastern District of Oklahoma.

routinely communicated with an employee of regarding invoices and payments for invoices. The communication between and was, for the most part, done via email. never met in person. The email address utilized by was com and the email address utilized by was com.

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<sup>1</sup> Aggregates refer to materials such as sand, gravel, or crush stone that are commonly used as ingredients in concrete.

12. On November 1, 2023, reported to the Internet Crimes Complaint Center (iC3) that their companies had been defrauded through a suspected Business Email Compromise (BEC) scam. On September 15, 2023, wired approximately \$546,053.30 to a fraudulent Citibank account. Between October 13 and October 24, 2023, wired approximately \$650,000 to another fraudulent Citibank account. In total, approximately \$1.2 million was wired to unknown individual(s) utilizing the fraudulent domain names of “ com” and “dolesae.com”.

13. owned the domain name com” and utilized a third-party information technology company to manage all its computer network infrastructure, including email and web services. The third-party information technology company maintained logs produced by the services running on the computers, including logs for a Microsoft Office 365 Email Exchange (O365) server.

**Initial Phish of by Uncharged Co-Conspirator 1 (“UCC-1”)**

14. J. ‘B. is employed as a Construction Supervisor at During an interview with law enforcement, stated that on September 7, 2023, she received an email from an individual whom she believed was the real Construction Supervisor, In the email, the individual portraying himself as requested his payroll bank account information be changed to the following:

Account Type: Checking

Routing Number:

Account Number:

Bank Name: Green Dot Bank

15. A review of the email sent to [REDACTED] from [REDACTED] showed an email address of "officeoffice0321@gmail.com". Records received from Google showed "officeoffice0321@gmail.com" was linked by cookie<sup>2</sup> to multiple accounts with a similar naming convention, however it was also linked by cookie to a personal email address used by UCC-1.

16. Records received from Google showed the personal email address used by UCC-1 had an account recovery phone number beginning with +234. The +234 prefix indicated a Nigerian phone number. A formal Bank Verification Number request was sent to the Government of Nigeria for the phone number. The Nigerian government response showed the phone number belonged to UCC-1.

17. Records received from Apple, Inc. related to the personal email address belonging to UCC-1 contained photographs of a computer with a web browser accessing Gmail and the Microsoft Windows application “Notepad” open. The same language found in the email from " to requesting to update banking information is displayed on the “Notepad” page. The records from Apple also contained a screenshot of the account and routing number for Green Dot Bank – the same banking information provided from " to Lastly, the records from Apple, Inc. contained a screenshot of a Telegram conversation likely occurring between UCC-1 and an individual going by the screenname “Sodiq” related to the use of a U.S. Person’s identification and credit card.

18. Ultimately, on September 8, 2023, [redacted] updated the payroll records for the real [redacted] Construction Supervisor, [redacted] However, UCC-1, according to records received from [redacted]

<sup>2</sup> A cookie is a packet of data sent by a web server to a browser, which is returned by the browser each time it subsequently accesses the same server, used to identify the user or track their access to the server.



Green Dot, received the payroll payment in the amount of \$1217.33 that was sent to “ by

**Creation of Virtual Private Server by Uncharged Co-Conspirator 2 (“UCC-2”) That  
Hosted Phishing Domain**

19. According to the logs provided by on September 8, 2023, a login event from IP address 88.80.190.5 was created for user account com.

20. A WHOIS lookup of 88.80.190.5 showed Linode (now Akamai) was the owner of the IP address at the time of the event.

21. A 2703(d) Order was issued by this court and served to Linode for records pertaining to IP address 88.80.190.5. Records received from Linode provided an email account of rupettahauenstein@gmail.com as provided by UCC-2, the creator of the Linode virtual private server using IP address 88.80.190.5 at the time of the phishing scam.

22. A 2703(d) Order was issued by this court and served to Google for records pertaining to email address rupettahauenstein@gmail.com. Records received from Google showed the recovery email address of xvioletta2013@gmail.com. A review of search warrant returns related to Raidforums<sup>3</sup>, from May 3, 2021, showed the Raidforums moniker ‘xSpooky’ provided the recovery email address xvioletta2013@gmail.com as a restore email address to Raidforums user “sbarwise”.

23. Further review of historical Raidforums data revealed that ‘xSpooky’ created a Raidforums account on November 7, 2020 using the email address korinevskiyivan@gmail.com and listed a date of birth of May 18, 1987.

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<sup>3</sup> RaidForums was an English-language black hat hacking internet forum founded in 2015. The website facilitated the discussion of a variety of hacking topics and was a notable distributor of various data breaches, hacking tools, and pornography until its closure.

24. On November 7, 2020, ‘xSpooky’ created a forum post on Raidforums titled: “WTS | Cloud – AZURE | LINODE | VULTR | HETZNER | GOOGLE | and more other”, which included pricing for multiple virtual private server space that had previously been purchased. In the forum post, ‘xSpooky’ also provided a Telegram link of ‘https://t.me/xSpooky’. As of September 2024, ‘xSpooky’ was still active on Telegram and continued to sell access to virtual private servers. The name listed in the Telegram profile for ‘xSpooky’ was Ivan Korinevskyi.

25. A search warrant issued by this court for email address korinevskiyivan@gmail.com showed the recovery email address as xvioletta2013@gmail.com.

26. According to records received from Binance, the email address korinevskiyivan@gmail.com was used to register an account on March 6, 2021 in the name of Ivan Korinevskyi. The records showed Ivan Korinevskyi, date of birth May 18, 1987, currently resides in Ukraine.

27. Based on this information, I believe UCC-2, the creator of the Linode account, sold access to a virtual private server with IP address 88.80.190.5 to UCC-3 and UCC-3 used that virtual private server to obtain the login credentials for as described below.

### **Uncharged Co-Conspirator 3 (“UCC-3”) Spear Phishing**

#### **Campaign Targeting**

28. uses Microsoft O365 for access to email. According to the logs provided by on September 8, 2023, com simultaneously logged in from IP address 12.31.154.98 and IP address 88.80.190.5. IP address 12.31.154.98 geo-locates to Ardmore, Oklahoma while IP address 88.80.190.5 geo-locates to Greenwich, United Kingdom.

**Review of                      Computer Used by**

29. According to a review of cookies stored on the computer provided by [REDACTED] on September 8, 2023, at approximately 12:09:17 p.m. Central Standard Time, [REDACTED] navigated to “outlook.office.com”. Approximately eighteen seconds later at 12:09:35 p.m. Central Standard Time, [REDACTED] navigated to the domain “flcraneOnline.parcexpo.online”. Approximately twenty seconds later at 12:09:55 p.m. Central Standard Time, [REDACTED] navigated to the domain “parcexpo.online”. This domain name was created on September 8, 2023 by UCC-3.

30. A review of the logins stored on the computer provided by [REDACTED] showed that, at approximately 12:10:06 p.m. Central Standard Time, the user name and password for [REDACTED] com account was passed to “flcraneOnline.parcexpo.online”.

31. The domain parcexpo.online was first seen on September 8, 2023 and resolved to IP address 88.80.190.5 – the same IP address seen on the logs provided by [REDACTED] as remotely logging into the [REDACTED] com account and being operated through the Linode account created by UCC-2.

32. As of April 16, 2024, the domain name “parcexpo.online” was offline and could not be reached.

33. Based on my training and experience, statements made by [REDACTED] and the artifacts from the computer provided by [REDACTED] I believe “flcraneOnline.parcexpo.online” was a phishing page designed to resemble a website where the user could login for a legitimate service, but the page ultimately redirected to a malicious site that stole the username and associated password. The phishing page “flcraneOnline.parcexpo.online” is a subdomain of “parcexpo.online”. Based on my training, experience and review of information provided by NameCheap and Coinbase, I believe the simultaneous login by [REDACTED] on September 8, 2023, and

the IP address 88.80.190.5 on September 8, 2023, was the result of the successful phishing activity on the same day, by which [redacted] s login and password were transferred without authorization to UCC-3 utilizing IP address 88.80.190.5.

**Fraudulent Activity by Uncharged Co-Conspirator 4 (“UCC-4”) Related to Email Rule**

**Change and Spoofed**

**Domain**

34. On September 12, 2023, user [redacted] com, from IP address 40.116.81.133, which Geo-locates to Chicago, at approximately 8:51 a.m. Central Time, created a new Inbox rule. The IP address connecting to the O365 server had not previously been seen by the third-party information technology company and deviated from the IP addresses typically seen when [redacted] com logged into the O365 server. [redacted] stated she never logged into her email account outside of her office at the [redacted] business complex in Ardmore, Oklahoma.

35. A review of Inbox rules used by [redacted] com identified a rule titled “...”, that used the following language: “If the sender’s address contains these words: ‘@ [redacted] com’, mark the message as Read, move the message to folder ‘RSS Feeds’ and stop processing more rules on this message.”

36. Based on my training and experience, this rule was created to specifically hide legitimate emails coming from “ [redacted] com” and allow fraudulent emails spoofing the ‘ [redacted] com’ domain to remain undetected.

37. On September 12, 2023, at approximately 9:32 a.m. Central Time, [redacted] received an email from [redacted] com requesting [redacted] update its bank account information for [redacted] and begin remitting payments to a newly identified bank account. According to Google, [redacted] com logged in via IP address 40.116.81.133 – the same IP address that Geo-locates to Chicago and was used to login to [redacted] com and create an inbox rule. The

email had an attachment with a Citibank account number ending in x5917. However, the Citibank account was not owned by [REDACTED] and [REDACTED] com was fraudulently posing as a real [REDACTED] employee. [REDACTED] previously communicated with [REDACTED] the actual employee at [REDACTED] via the email address [REDACTED] com regarding payments and billing. The email received on September 12, 2023 was received from the domain name "[REDACTED] com" – a domain with an 'a' added to the end of "[REDACTED] responded and agreed with the unknown user(s) of [REDACTED] com to update [REDACTED] systems to reflect the fraudulent [REDACTED] bank account information. On the same day, [REDACTED] received another email from the unknown user(s) of [REDACTED] com asking when to expect payment. [REDACTED] responded to the unknown user(s) of [REDACTED] com by stating "We pay on the due date 9/15."

38. On September 14, 2023, [REDACTED] and [REDACTED] a separate victim not associated with [REDACTED] wired funds totaling approximately \$850,000 to the fraudulent Citi account ending in x5917.

39. [REDACTED] utilizes First United Bank, which is headquartered in Durant, Oklahoma. Durant, Oklahoma is located in the Eastern District of Oklahoma. On September 15, 2023, [REDACTED] wired funds, from First United Bank, which is located in the Eastern District of Oklahoma, totaling approximately \$546,053.30 to the fraudulent Citi account ending in x5917. [REDACTED] made these transfers believing they were making payments owed to [REDACTED] The fraudulent Citi account was opened at a Citibank branch in Evanston, Illinois.

40. Based on my review of material provided by NameCheap.com, a website from which one can purchase internet domains, on September 12, 2023, the domain name "[REDACTED] com" was purchased from IP address 40.116.81.133. Based on my training and experience, I believe UCC-4 conspired with UCC-3 to fraudulently obtain account credentials for the [REDACTED] com email account. Based on my training and experience, I believe UCC-4,

and others unknown to me, fraudulently accessed the \_\_\_\_\_ ovco.com email account, fraudulently accessed and changed rules for the \_\_\_\_\_ ovco.com email account and fraudulently caused \_\_\_\_\_ to wire funds to a fraudulent bank account.

**B. Citibank Account Used in Business Email Compromise Fraud Opened Fraudulently by Jalen Cancel and Omobolanle Bombata**

**Identification of Jalen Cancel**

41. According to account opening documentation provided by the Citibank branch located at \_\_\_\_\_, Winnetka, IL 60093, on or around July 20, 2023, Citibank x5917 was opened by Dexter Shaws LLC, whose owner was purportedly an individual named Jonathan Dexter Cancel.

42. According to information available from the Illinois Secretary of State, Dexter Shaws LLC was formed on or around July 10, 2023. The Registered Agent for Dexter Shaws LLC is Jonathan Dexter Cancel.

43. According to an FBI interview of a Citibank Employee (Citibank Employee A), Citibank Employee A was responsible for processing the paperwork provided by the individual claiming to be Jonathan Dexter Cancel to open Citibank x5917. Citibank Employee A had several interactions with the individual purporting to be Jonathan Dexter Cancel.

44. According to Citibank Employee A, the applicant for the Citibank x5917 account provided a social security card and an Ohio driver's license that were each purportedly issued to Jonathan Dexter Cancel. Photographs of each are reproduced below:





According to the social security card, Jonathan Dexter Cancel's social security number is

. The driver's license RC was purportedly issued by the State of Ohio to Jonathan Dexter Cancel at the address of , Cincinnati, OH 45207.

45. According to the Social Security Administration, as of January 16, 2024, SSN -5741 has not been issued to anyone.

46. According to the Ohio Bureau of Motor Vehicles ("Ohio BMV"), as of December 20, 2023, there is no record of a driver's license No. RC or of a driver named Jonathan Dexter Cancel. However, according to the Ohio BMV, the address , Cincinnati, OH 45207 is the address for an Ohio driver's license issued to Jalen Cancel. The driver's license photo for Jalen Cancel on file with the Ohio BMV is reproduced below.



47. According to a public records search, there were prior periods where Jalen Cancel and Jonathan Dexter Cancel both shared the same address as their primary residence. During a search warrant of Jalen Cancel's residence, Jalen Cancel and Jalen Cancel's mother, E. P., stated Jonathan Dexter Cancel lives in the Philippines and is Jalen Cancel's brother.

## Photo Array Identification of Jalen Cancel

48. During an interview with Citibank Employee A on or around February or March of 2024, the FBI provided a photo array to Citibank Employee A with four driver's license photos. Photos of Jonathan Dexter Cancel and Jalen Cancel were included. When asked if he could identify the individual that opened the Citibank account ending in x5917, Citibank Employee A pointed to the driver's license photo of Jalen Cancel, reproduced below. This driver's license photograph was obtained from the Illinois DMV. And based on Illinois DMV records, this driver's license photograph was taken more recently than the Ohio BMV photograph discussed in paragraph 46 above.



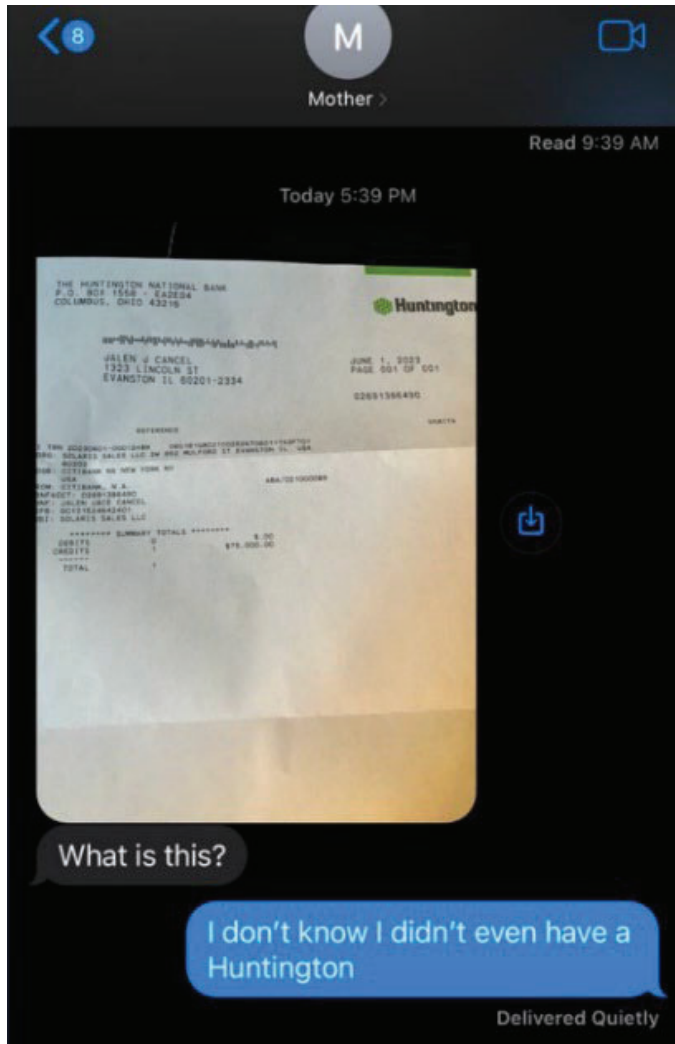
## Search Warrant Issued for Residence of Jalen Cancel

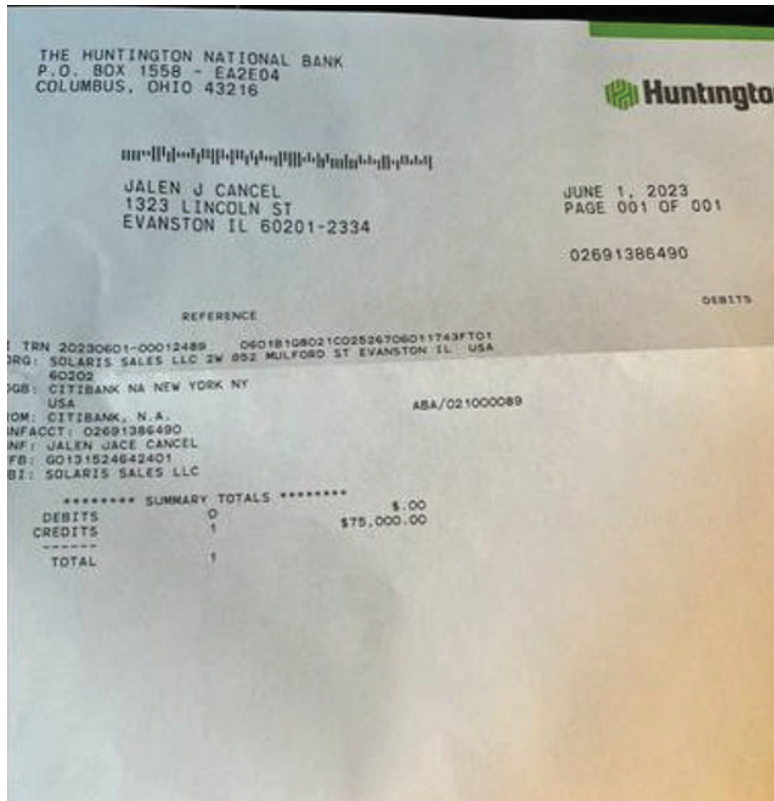
49. In May of 2024, a search warrant was issued by the Federal District Court, in the Northern District of Illinois, for address 1323 Lincoln Street, Evanston, IL 60201, for the purposes of searching and seizing evidence related to fraud committed against [REDACTED]. During the search, investigators located a phone identified as belonging to Jalen Cancel.

**Telegram Messages - GoGadget and Jimmy2Times Identified as Jalen Cancel and Omobolanle Bombata**

50. Upon searching the telephone identified as being owned by Cancel, your Affiant discovered a Telegram message string between user GoGadget (owner) and user Jimmy2Times. Based on the content of the messages, as explained further below, I believe Cancel used the moniker GoGadget and Bombata used the moniker Jimmy2Times.

51. In the Telegram message string, on June 7, 2023, GoGadget makes the statement, “I’m ducked” and sends a photograph to Jimmy2Times. Jimmy2Times asks: “Nigga why y put ur address there”, “Should’ve changed the mailing addy when u was opening up”. The photograph to which GoGadget is referring is a screenshot of a text message between himself and “Mother” about an account statement from Huntington National Bank to Jalen J Cancel, 1323 Lincoln St, Evanston, IL 60201-2334, for Solaris Sales LLC, for a credit of \$75,000.





52. In the Telegram message string, on July 6, 2023, Jimmy2Times asks GoGadget: “Nigga which crib tf”, “Quit acting slow bro”. GoGadget responds with: “Evanston”, “Lincoln”. Based on my training and experience, the word ‘crib’ is slang for ‘house’. I believe GoGadget was telling Jimmy2Times where his house is located. Jalen Cancel lives at 1323 Lincoln Street, Evanston, IL 60201.

53. In the Telegram message string, on July 6, 2023, Jimmy2Times makes the statement: “Easy bread liter[a]lly”. GoGadget replies: “Bola bro”. Based on my training and experience, I believe Bombata was offering for Jalen Cancel to make easy money, described as ‘bread,’ and Jalen Cancel identified Jimmy2Times as Bola, a known alias for Bombata. Omobolanle Bombata, on social media, goes by the moniker “bola.flexx” and is also referred to in Jalen Cancel’s phone as “Bola” and “Bola 2”.

54. In the Telegram message string, on September 1, 2023, Jimmy2Times asks GoGadget: “Who’s that”. GoGadget responds: “Anna Jacobson”, “You know her”, “She literally went to von with y”. In an email exchange with your Affiant, ., Principal of Von Steuben Metropolitan Science Center, confirmed that Omobolanle Bombata, also known as Oluyomi Omobolanle Yunus Bombata, date of birth 1999, Social Security account number ending in 0784, attended Von Steuben from 9/2013 to 6/2017.

55. In the Telegram message string, on October 3, 2023, Jimmy2Times sends GoGadget a video. The below photograph is a screenshot taken from that video:



56. During an interview of a cooperating witness, a known associate of Bombata, the cooperating witness was asked to identify the individual shown in the screenshot provided above. The cooperating witness stated, “that’s Bola.”

**Telegram Messages – Bombata and Cancel Conspire to Open Citibank Account Used to Defraud**

57. In the Telegram message string, on June 9, 2023, Bombata forwards a message with a picture to Cancel. The photograph sent from Bombata and the driver’s license used to open the Citibank account ending in x5917 are shown below:





Based on my training and experience, I believe Bombata is communicating via Telegram with an individual, who he already knows, that can create fake driver's licenses.

58. In the Telegram string, on June 12, 2023, Bombata and Cancel have a conversation regarding the retrieval of an identification card. The conversation is reproduced below:

From: 935310563 Jimmy2times  
Has your id arrived

6/12/2023 6:20:03 PM(UTC+0)

From: 935310563 Jimmy2times  
I need a picture of it asap

6/12/2023 6:20:07 PM(UTC+0)

From: 724789251 GoGadget (owner)  
It's at shorty crib ?

6/12/2023 6:20:37 PM(UTC+0)

From: 724789251 GoGadget (owner)  
So my brother is the pro right

6/12/2023 6:20:50 PM(UTC+0)

From: 935310563 Jimmy2times  
Nigga it's been there since Saturday.

6/12/2023 6:21:04 PM(UTC+0)

From: 935310563 Jimmy2times  
Literally

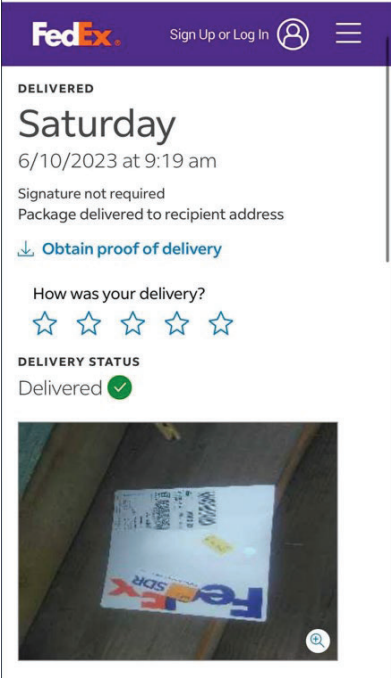
6/12/2023 6:21:06 PM(UTC+0)

From: 935310563 Jimmy2times  
Attachments:



Size: 61340  
File name: telegram-cloud-photo-size-1-4916182707405611160-y  
telegram-cloud-photo-size-1-4916182707495611160-y

6/12/2023 6:21:23 PM(UTC+0)



From: 724789251 GoGadget (owner)  
Ok

6/12/2023 6:21:31 PM(UTC+0)

From: 724789251 GoGadget (owner)  
What's the name

6/12/2023 6:21:35 PM(UTC+0)

From: 935310563 Jimmy2times  
Jonathan Dexter cancel

6/12/2023 6:21:45 PM(UTC+0)

From: 935310563 Jimmy2times  
Get the ID

6/12/2023 6:30:58 PM(UTC+0)

From: 935310563 Jimmy2times  
So we can start working

6/12/2023 6:31:02 PM(UTC+0)

From: 724789251 GoGadget (owner)  
She don't get off till later

6/12/2023 6:32:13 PM(UTC+0)

From: 724789251 GoGadget (owner)  
Like 7

6/12/2023 6:32:16 PM(UTC+0)

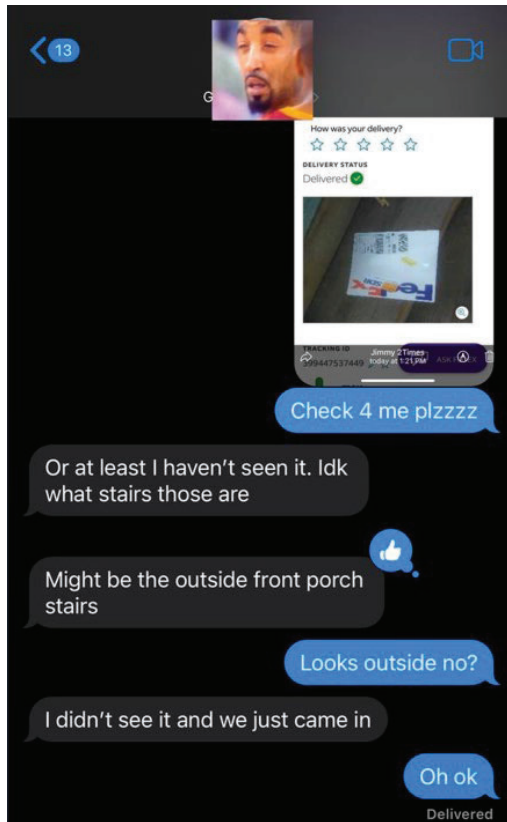
From: 724789251 GoGadget (owner)

**Attachments:**



Size: 57566  
File name: telegram-cloud-photo-size-1-4916182707495811180-y  
telegram-cloud-photo-size-1-4916182707495811180-y

6/12/2023 9:16:27 PM(UTC+0)





From: 935310563 Jimmy2times  
Mailed to this addy

6/12/2023 9:18:41 PM(UTC+0)

From: 935310563 Jimmy2times  
This the right addy?

6/12/2023 9:18:45 PM(UTC+0)

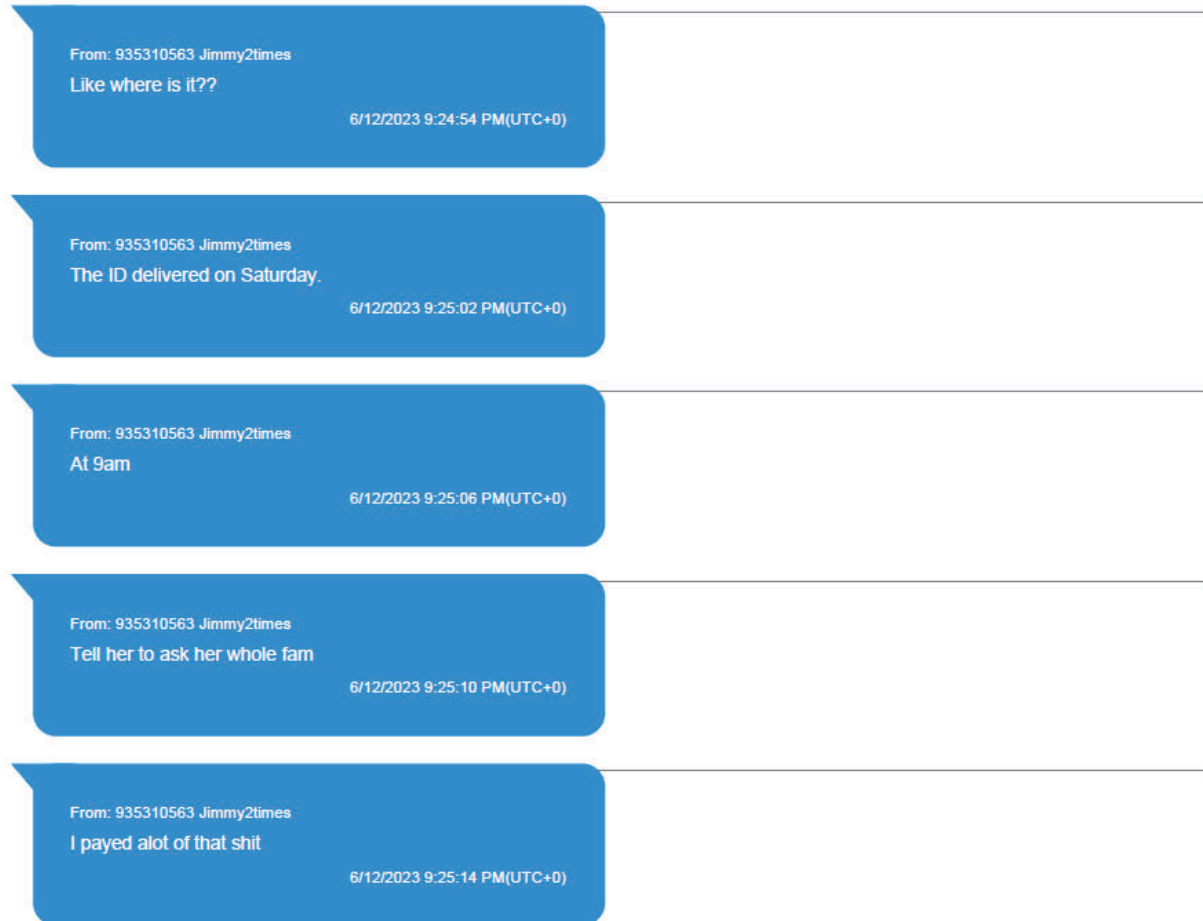
From: 935310563 Jimmy2times  
It came on Saturday

6/12/2023 9:18:58 PM(UTC+0)

From: 724789251 GoGadget (owner)  
Yeah

6/12/2023 9:19:02 PM(UTC+0)





59. I believe Bombata is asking Cancel if he picked up the driver's license ultimately used by Cancel to open the Citibank account ending in x5917. I believe when Cancel asks Bombata if it's at "shorty crib", Cancel is referring to his girlfriend, G. G. Cancel's girlfriend, G. G., lives as Ave., Evanston, IL 60201. I believe Cancel also asks Bombata if his "brother is the pro right" in reference to his brother, Jonathan Dexter Cancel. Cancel asks again, "What's the name" and Bombata responds with "Jonathan Dexter Cancel". Bombata confirms the name and address of Jonathan Dexter Cancel, Ave., Evanston, IL 60201 when he sends Cancel a photograph of the label on the FedEx package. When Bombata states, "I payed alot of that shit", I believe he is telling Cancel that he paid the individual described in paragraph 58 to

create the fake driver's license and he wants Cancel to take a picture of it so they can begin fraudulently opening accounts.

60. In the Telegram message string, on July 12, 2023, Bombata tells Cancel: "Go open up dude", "CITI BOA 5/3". Based on my training and experience, Bombata is telling Cancel to open accounts at Citibank, Bank of America and 5/3 Bank.

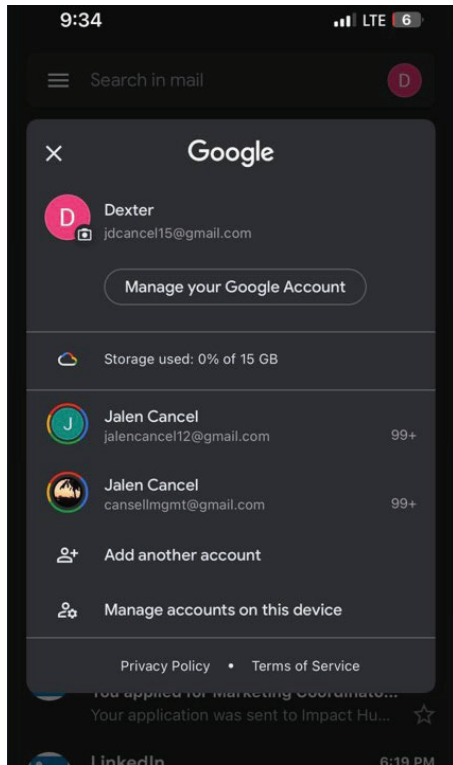
61. In the Telegram message string, on July 15, 2023, Bombata asks Cancel: "Anyway did u get the phone". Cancel responds: "Lol getting it now", "What's yo other line". Cancel then sends a photograph to Bombata of the sim card purchased from Ultra Mobile with the phone number -806-7426 then states, "That's me".



In the documentation provided for the opening of Citibank account x5917, the phone number - 806-7426 was given as the phone number for Dexter Shaws LLC.

62. In the Telegram message string, on July 15, 2023, Bombata tells Cancel to "Make that email tonight". Cancel responds with, "I made it already" and sends a screenshot of his phone showing jdcancell5@gmail.com as currently logged in. Also seen on the screen are email accounts jalencancell12@gmail.com for "Jalen Cancel" and cansellmgmt@gmail.com for "Jalen Cancel".

In the documentation provided for the opening of Citibank account ending in x5917, jdcancel15@gmail.com was used to create the account.



63. In the Telegram message string, on July 15, 2023, Bombata sends Cancel the following information:

“Name: JONATHAN DEXTER CANCEL

DOB -1992

New email jdcancel15@gmail.com

New Phone -806-7426

SSN -87-5741”

The conversation continues with Bombata asking Cancel to “Send that Ohio addy again”, “Asap”.

Cancel states, “On the lid”, “. As shown in paragraph 56, , Cincinnati, OH 45207 is the address on the driver’s license used to open the Citibank account ending in x5917. Account opening documentation provided by Citibank shows the above name,

date of birth, email address, phone number and social security number were used to open the account ending in x5917.

64. In the Telegram message string, on July 17, 2023, Bombata sent a file to Cancel titled, "DEXTERC SHAWS LLC.PDF". The LLC documentation for DEXTERC SHAWS LLC shows [REDACTED] Ave., Evanston, IL 60201. During an interview in May of 2024, G. G. stated she had been dating Jalen Cancel for the past three years and that he often stayed the night with her. G.G. lives at [REDACTED] Ave., Evanston, IL 60201. G.G. stated Jalen Cancel has a brother named Dexter Cancel. G.G. stated that Dexter had been living in the Philippines for the past two years.

65. In the Telegram message string, on July 18, 2023, Cancel asks Bombata, "Can you get me utility", "Bill". Bombata responds with, "I'm pretty sure ur smart enough to make that yourself". Continuing in the Telegram message string, on July 19, 2023, Cancel states, "I don't wanna be empty handed tomor[ow]", "At least tell me how to do it Wtf". Bombata responds, "U don't have any mail with your [B]ROTHERS name on it?". Cancel responds with, "No bc he's been in Philippines for 2 years", "And they're making me reschedule", "Bc I don't have utility". As stated by G.G. in her interview, Jalen Cancel has a brother named "Dexter Cancel". Jalen Cancel and E.P., during a search of their residence, stated Jalen Cancel has a brother named Jonathan Cancel and he lives in the Philippines. Based on my experience, I believe Bombata encouraged Cancel to create a fake utility bill ("ur smart enough to make that yourself") to use in opening up the Citibank account ending in x5917.

66. In the Telegram message string, on July 20, 2023, Bombata tells Cancel, "Aye make sure u put", "Your brothers name on your girls mailbox", "Pls make sure u do that". Bombata continues with, "Tomorrow citi bank it's very important u get citi bank". In her interview on May

9, 2024, G.G. stated that approximately one year ago, Jalen Cancel asked G.G. if Dexter could use her address for Dexter's mail until Dexter found a permanent address in the Philippines. Over the course of the previous year, G.G. received mail from banks addressed to Dexter Cancel.

67. In the Telegram message string, on July 20, 2023, Cancel tells Bombata that he is going to Citibank in "winnetka". According to records provided by Citibank, the Citibank account ending in x5917 was opened at \_\_\_\_\_, Winnetka, IL 60093.

68. In the Telegram message string, on July 20, 2023, Cancel sends a message to Bombata saying, "Green". Bombata responds, "U made it?", "Let me see". Cancel responds, "No he said he has to submit and he will call me tomorrow", "He said acco[u]nt should be open 24-48". According to records provided by Citibank and an interview of Citibank Employee A, when Cancel says "he will call me tomorrow", he is referring to Citibank Employee A.

69. According to emails provided by Citibank, Cancel, from jdcancel15@gmail.com, emailed a copy of the fake social security card, a fake driver's license and a fake utility bill for Jonathan Dexter Cancel to Citibank Employee A. Upon Citibank's KYC department receiving the documentation, the Citibank account ending in x5917 was approved for opening on August 10, 2023.

**Telegram Messages Discussing Wires from DEXTERC SHAWS LLC Citibank Account to**

**Other Accounts**

70. Based on my review of records provided by Citibank, on or around September 14, 2023, Dacotah Bank and Trust wired approximately \$850,000 to the Citi x5917 account.

71. Based on my review of records provided by Citibank, on or around September 15, 2023, \_\_\_\_\_ wired approximately \$546,053.30 to the Citi x5917 account.

72. On September 15, 2023, the Citi x5917 account conducted the following transactions:

Wired \$177,750 to a separate Dexter Shaws, LLC account;  
Wired \$245,000 to a separate Dexter Shaws, LLC account;  
Wired \$225,000 to Kassoum Diabagate  
Wired \$394,980 to The African Shrine LLC  
Wired \$350,000 to Bakary BIA Logistics

73. In the Telegram message string, on September 13, 2023, Bombata tells Cancel to “Send screenshot of the citi”.

74. In the Telegram message string, on September 14, 2023, Bombata tells Cancel to “Stay on your phone”, “Citi go to call u to verify wire”. Cancel responds with “Ok”, “Who’s it from?”. Bombata replies with “Nigga they didn’t call u yet calm down”, “They not even go to ask that”, “Just stay on point with both phones”. Approximately one hour later, Bombata sends another message saying “Citi might call the other phone and ask if u set up a wire”. Cancel asks Bombata, “What do I say”. Bombata tells Cancel “Say u did a wire for 350k to bakery bia logistics Llc in Atlanta Georgia”, “And u approve it and you will be doing more”. Based on my training and experience, I believe Bombata was running Cancel as a money mule and instructing him regarding money transfers into the Citibank account opened by Cancel.

75. On September 14, 2023, Cancel calls Citibank to confirm an incoming wire of \$350,000. The Citibank employee notifies Cancel that there was an incoming wire of \$850,000 that had not yet been credited. Cancel apologizes to the Citibank employee and states that he got the numbers mixed up. In the Telegram message string, on September 14, 2023, Bombata and Cancel have an exchange related to the wire for \$350,000. Cancel states, “I thought you meant incoming”, “My bad”. Bombata responds with “Nigga did I say incom[ing] mf”, “No Nigga u tweaking nigga I literally told yo stupid ass 350k wire u did”, “The incoming was 850.” Based on



my review of the Citibank account ending in x5917, on September 14, 2023, a wire for \$850,000 was received from the            and    .

76. In the Telegram message string, on September 15, 2023, Bombata admonishes Cancel to “Tell them your going to be doing more for big amounts so u don’t have to keep calling.” On September 15, 2023, Cancel contacts Citibank and states that he needs to get the \$350,000 wire approved for Bakary BIA Logistics so he can do some more. Based on my training and experience, Bombata is directing Cancel to notify Citibank that he will be doing more wires so that Citibank will not flag the wires as fraudulent and conduct a review.

77. In the Telegram message string, on September 15, 2023, Bombata tells Cancel, “177,750 to your Dexter c SHAWS 5/3”. Based on my review of the records provided by Citibank and 5/3 Bank, approximately \$177,750 was wired from the Dexter Shaws LLC Citibank account to the Dexter Shaws LLC 5/3 Bank account on September 15, 2023.

78. In the Telegram message string, on September 15, 2023, Bombata and Cancel have the following exchange:

Bombata – “245”

Cancel – “To where”

Bombata – “To your Bank of America”

Cancel – “Ok”

Bombata – “Dexter c SHAWS llc”. Based on my review of the records provided by Citibank and Bank of America, approximately \$245,000 was wired from the Dexter Shaws LLC Citibank account to the Dexter Shaws LLC Bank of America account on September 15, 2023.

79. In the Telegram message string, on September 15, 2023, Bombata tells Cancel “225,000 to KASSOUM DIABAGATE”, “Wells Fargo”. Cancel contacted Citibank to confirm

the wire transaction for \$225,000. On the phone call with Citibank, Cancel was asked by the Citibank employee to confirm to whom the wire was to be transferred and Cancel stated, “Kassoum Diabagate”. The Citibank employee asked if Cancel received an email with the wiring instructions to include the account and routing information. Cancel responded, “Yeah”. The Citibank employee asked Cancel if he called to confirm that the wiring instructions were valid. Cancel stated, “yes ma’am”.

80. In the Telegram message string, on September 15, 2023, Bombata asks Cancel, “The one for 394 right?”, “It’s all good?”, “Login and check??”. Cancel responds, “394 left”. Based on the records provided by Citibank, Bombata and Cancel are referencing the wire sent to the African Shrine LLC for \$394,980.

81. Based on my training and experience, Cancel and Bombata, along with other individuals unknown to me, as well as with uncharged co-conspirators, conspired to conduct a phishing scheme, spear phishing campaign and a business email compromise that included a computer intrusion and ultimately defraud Corporation and other victims. Cancel and Bombata conspired to create a fraudulent business, Dexter Shaws LLC, by using a fraudulent driver’s license and Social Security card, for the specific purposes of creating fraudulent bank accounts. Upon receiving funds, Cancel and Bombata further conspired to wire funds from the fraudulent Citibank account to five other fraudulent accounts, including two accounts created for Dexter Shaws LLC at Bank of America and 5/3 Bank.

### **CONCLUSION**

82. Based on the above information and the totality of circumstances, Affiant submits there is probable cause to establish that, from in and around June 2023, and continuing through in and around November 2023, in the Eastern District of Oklahoma and elsewhere, **JALEN JACE**

**CANCEL** and **OMOBOLANLE** (a.k.a. “**BOLA**,” “**BOLA FLEXX**”) **BOMBATA**, did knowingly and intentionally conspire and agree together, and with UCC-1, UCC-2, UCC-3, UCC-4 and other persons known and unknown to the United States, to devise a scheme and artifice to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purposes of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communications in interstate commerce certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Sections 1343 and 1349.

83. Based on the above information and the totality of circumstances, Affiant submits there is probable cause to establish that, from in and around June 2023, and continuing through in and around November 2023, in the Eastern District of Oklahoma and elsewhere, **JALEN CANCEL** and **OMOBOLANLE** (a.k.a. “**BOLA**,” “**BOLA FLEXX**”) **BOMBATA** did knowingly and intentionally conspire and agree together with other persons known and unknown to the United States, to attempt to conduct financial transactions which involved the proceeds of wire fraud knowing that the transaction was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of wire fraud, contrary to Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(h).

84. Affiant submits that there is probable cause to believe that, from in and around June 2023, and continuing through in and around November 2023, in the Eastern District of Oklahoma and elsewhere, **JALEN JACE CANCEL** and **OMOBOLANLE** “**BOLA**” **BOMBATA** did knowingly and intentionally conspire and agree together with other persons known and unknown to the United States, to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and is derived from wire fraud, contrary to Title 18, United States Code, Sections 1957(a) and 1956(h).



Charles Stanley  
FBI, Special Agent

Sworn to: November 18, 2024



UNITED STATES MAGISTRATE JUDGE